

# **Exhibit A**

**Ibarra, Massiel (MIA - X27545)**

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**From:** Megan Muoio <mmuoio@allynfortuna.com>  
**Sent:** Wednesday, July 31, 2024 3:38 PM  
**To:** Cuza, Jesus E (MIA - X27513); Nicholas Fortuna; Canamero, Rebecca J (MIA - X27533)  
**Cc:** Ibarra, Massiel (MIA - X27545); Marinelli, Marisa (NYC - X73239); Del Rivero, Annelise (MIA - X27589)  
**Subject:** RE: Sound Around v. Friedman (follow up)

*[External email]*

Jesus,

As far as we understand, the Court has not yet scheduled a hearing on the preliminary injunction motion so there is nothing for us to do at this time.

Thank you,  
Megan J. Muoio

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**From:** Jesus.Cuza@hklaw.com <Jesus.Cuza@hklaw.com>  
**Sent:** Wednesday, July 31, 2024 12:38 PM  
**To:** Megan Muoio <mmuoio@allynfortuna.com>; Nicholas Fortuna <nfortuna@allynfortuna.com>; Rebecca.Canamero@hklaw.com  
**Cc:** Massiel.Ibarra@hklaw.com; Marisa.Marinelli@hklaw.com; Annelise.DelRivero@hklaw.com  
**Subject:** RE: Sound Around v. Friedman (follow up)

Megan, we will be moving the court for the hearing on the MPI and we are taking steps to follow the Judge's individual rules. See R. 5.G and 7.E. This is what we intend to cover with you and Nick during the conference. Please let us know if you are available for the conference at 5:15 pm. If not, please provide a time that works after 5:15 pm. I suspect we can cover everything in 15 minutes or less.

Thx

Jesus

**Jesus E. Cuza | Holland & Knight**

Partner

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**From:** Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

**Sent:** Tuesday, July 30, 2024 2:39 PM

**To:** Cuza, Jesus E (MIA - X27513) <[Jesus.Cuza@hklaw.com](mailto:Jesus.Cuza@hklaw.com)>; Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>; Canamero, Rebecca J (MIA - X27533) <[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>

**Cc:** Ibarra, Massiel (MIA - X27545) <[Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com)>; Marinelli, Marisa (NYC - X73239) <[Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com)>; Del Rivero, Annelise (MIA - X27589) <[Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)>

**Subject:** RE: Sound Around v. Friedman (follow up)

*[External email]*

Jesus,

What is the reason that you want to discuss the preliminary injunction with us?

Thank you,

Megan J. Muoio

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**From:** [Jesus.Cuza@hklaw.com](mailto:Jesus.Cuza@hklaw.com) <[Jesus.Cuza@hklaw.com](mailto:Jesus.Cuza@hklaw.com)>

**Sent:** Tuesday, July 30, 2024 1:36 PM

**To:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>; [Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com); Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

**Cc:** [Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com); [Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com); [Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)

**Subject:** RE: Sound Around v. Friedman (follow up)

Hi Nick and Megan,

Please provide times for a call or zoom conference today (at or after 5:30 pm) today or tomorrow afternoon or evening—topic: the preliminary injunction. We did not hear back from you last week and we need to move this now that you are done with your trial. Thank you both.

Jesus

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**From:** Cuza, Jesus E (MIA - X27513)

**Sent:** Tuesday, July 23, 2024 6:48 PM

**To:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>; Canamero, Rebecca J (MIA - X27533)

<[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>; Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

**Cc:** Ibarra, Massiel (MIA - X27545) <[Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com)>; Marinelli, Marisa (NYC - X73239)

<[Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com)>; Del Rivero, Annelise (MIA - X27589) <[Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)>

**Subject:** RE: Sound Around v. Friedman

Hi Nick and Megan, let's talk tomorrow about the preliminary injunction. Please let us know what works for you in the afternoon.

Thx

Jesus

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**From:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>

**Sent:** Thursday, July 11, 2024 3:43 PM

**To:** Cuza, Jesus E (MIA - X27513) <[Jesus.Cuza@hklaw.com](mailto:Jesus.Cuza@hklaw.com)>; Canamero, Rebecca J (MIA - X27533)

<[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>; Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

**Cc:** Ibarra, Massiel (MIA - X27545) <[Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com)>; Marinelli, Marisa (NYC - X73239)

<[Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com)>; Del Rivero, Annelise (MIA - X27589) <[Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)>

**Subject:** RE: Sound Around v. Friedman

*[External email]*

Hi Jesus,

We can discuss this issue after my trial is over. It is scheduled through July 23. If it ends sooner, I will reach out to you.

Regards,  
Nick

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**Sent:** Thursday, July 11, 2024 9:55 AM

**To:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>; [Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com); Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

**Cc:** [Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com); [Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com); [Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)

**Subject:** Re: Sound Around v. Friedman

I understand, Nick. We can agree to disagree. When would you like to have the meet and confer?

Best and thx,

Jesus

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**From:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>  
**Sent:** Thursday, July 11, 2024 9:40:38 AM  
**To:** Cuza, Jesus E (MIA - X27513) <[Jesus.Cuza@hklaw.com](mailto:Jesus.Cuza@hklaw.com)>; Canamero, Rebecca J (MIA - X27533) <[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>; Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>  
**Cc:** Ibarra, Massiel (MIA - X27545) <[Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com)>; Marinelli, Marisa (NYC - X73239) <[Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com)>; Del Rivero, Annelise (MIA - X27589) <[Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)>  
**Subject:** RE: Sound Around v. Friedman

*[External email]*

Hi Jesus,

We do not agree with you.

Regards,  
Nick

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**Cc:** [Massiel.Ibarra@hklaw.com](mailto:Massiel.Ibarra@hklaw.com); [Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com); [Annelise.DelRivero@hklaw.com](mailto:Annelise.DelRivero@hklaw.com)  
**Subject:** Re: Sound Around v. Friedman

Hi Nick. As we discussed, motions to dismiss do not stay discovery as a matter of law. I specifically mentioned this during the 26(f) conference. Happy to further meet and confer in good faith, but we need to proceed in accordance with the applicable rules.

Best,

Jesus

**Jesus E. Cuza | Holland & Knight**

Partner

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**From:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>

**Sent:** Thursday, July 11, 2024 8:07:54 AM

**To:** Canamero, Rebecca J (MIA - X27533) <[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>; Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

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**Subject:** RE: Sound Around v. Friedman

*[External email]*

Hi Rebecca,

It is our position that you cannot demand discovery pre-answer. As you know, Defendants maintain there are no valid claims that would keep this matter in federal court, or in any court for that matter. We need a decision from the judge on the motion to dismiss before going forward with discovery. Further, during our conference call, I made our position clear that the Rule 26 disclosures are not due until an answer is filed.

Regards,

Nick

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**From:** [Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com) <[Rebecca.Canamero@hklaw.com](mailto:Rebecca.Canamero@hklaw.com)>

**Sent:** Wednesday, July 10, 2024 10:13 PM

**To:** Nicholas Fortuna <[nfortuna@allynfortuna.com](mailto:nfortuna@allynfortuna.com)>; Megan Muoio <[mmuoio@allynfortuna.com](mailto:mmuoio@allynfortuna.com)>

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Subject: Sound Around v. Friedman

Counsel,

Please see attached Requests for Production directed to your clients.

Thank you,

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Partner

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